

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

JOHN RASH

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:20-CV-224-NBB-RP

LAFAYETTE COUNTY, MISSISSIPPI

DEFENDANT

AFFIDAVIT OF JOEY EAST

I, Joey East, being of age and sound mind, do hereby state the following matters of which I have personal knowledge. I state the following under penalty of perjury:


1. I am currently serve in the capacity of Sheriff of Lafayette County, Mississippi. I assumed office in January 2020. Before my election as Sheriff, I was employed as the Chief of Police of the City of Oxford, Mississippi. As the Chief of Police, I became acquainted with the pedestrian and vehicular traffic conditions, and related safety issues, in and around Oxford's Courthouse Square. The pedestrian and vehicular traffic were always a major concern to me as Chief of Police and now , as Sheriff, especially during the evening hours, because of the degree of traffic and the presence of a large student population within the Square at night.

2. When I took office as Sheriff, I expressed my strong concerns over the use of the Circuit Courthouse grounds at night because of the safety concerns arising from the poor lighting conditions and at times, the very heavy pedestrian and vehicular traffic in the immediate vicinity.



3. I have reviewed the video of the night time activities around the Square which is exhibit "L" to the County's Motion for Summary Judgment. Based on my experience and knowledge, the video accurately shows a typical night time scene during a Thursday through Saturday evening around and within the Square and shows the typical flow of pedestrians and vehicular traffic.

I declare the foregoing under penalty of perjury on this the ^{2ND} day of February, 2021.



Joey East, Sheriff of Lafayette County, Ms.